



DLA Piper LLP (US)  
1251 Avenue of the Americas, 27th Floor  
New York, New York 10020-1104  
www.dlapiper.com

Garrett D. Kennedy  
garrett.kennedy@dlapiper.com  
T 212.335.4708  
F 212.335.4501

May 18, 2017

VIA ECF

The Honorable Jean M. Azrack  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

The Honorable Anne Y. Shields  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

**Re: *Gathmann-Landini v. lululemon usa inc.*,  
Case No.: 2:15-cv-06867 (JMA)(AYS)**

Dear Judge Azrack and Judge Shields:

This firm represents defendant lululemon usa inc. ("Defendant") in the above-referenced action. We write jointly with counsel for plaintiff Rebecca Gathmann-Landini ("Plaintiff") in advance of the court conference scheduled for May 24, 2017 to respectfully ask that the Court enter and So Order the attached "Order in FLSA Case Requiring Discovery and Setting Initial Pretrial Schedule" (the "Proposed Order"). The parties further jointly request that the May 24, 2017 court conference be adjourned or converted to a telephonic conference.

The Proposed Oder is submitted pursuant to Judge Shields' May 24, 2016 Order regarding preliminary discovery scheduling, which requires the parties to meet and confer and submit an initial discovery plan in the form of the Proposed Order. (ECF Nos. 23, 23-1.) Because of Defendant's Motion to Dismiss, there was no need to file the Proposed Order at that time; however, this motion has now been resolved, Plaintiff has filed an amended pleading and Defendant has answered. As such, the parties met and conferred regarding dates to conduct initial discovery as required by Judge Shields' Order and have agreed to the schedule set forth in the attached Proposed Order.

Based on the foregoing, we respectfully ask that the Court enter the attached Proposed Order and either adjourn the May 24, 2017 court conference or convert it to a telephonic conference. We thank the Court of its attention to this matter.

Respectfully submitted,

A blue ink signature of Garrett D. Kennedy, Esq., written over a horizontal line.

Garrett D. Kennedy, Esq.

Enc.

cc: Kara S. Miller, Esq. (counsel for Plaintiff)